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Attorneys for Laura Hart

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re

PG&E CORPORATION

- and -

PACIFIC GAS AND ELECTRIC COMPANY,

Debtors.

Bankruptcy Case
Case No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**NOTICE OF APPEARANCE AND
REQUEST FOR SPECIAL NOTICE
BY LAURA HART**

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric
Company
☒ Affects both Debtors

* All papers shall be filed in the Lead Case,
No. 19-30088 (DM).

1 **PLEASE TAKE NOTICE** that Laura Hart (“Hart”) hereby requests, pursuant to Rules
2 2002, 3017, 9007, and 9010 of the Federal Rules of Bankruptcy Procedure, or pursuant to any
3 other applicable rule or statute, that notice of all matters which may come before the Court be
4 given to Hart’s counsel of record:

5 GROSS & KLEIN LLP
6 Stuart G. Gross
7 The Embarcadero
8 Pier 9, Suite 100
9 San Francisco, CA 94111
10 Telephone: (415) 671-4628
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13 The foregoing request includes, without limitation all notices, papers, and disclosure
14 statements referred to in Rules 2002, 3017, and 9007 of the Federal Rules of Bankruptcy
15 Procedure, and also includes notice of any orders, applications, complaints, demands, hearings,
16 motions, petitions, pleadings or requests, and any other documents brought before the Court in
17 this case, as well as anything concerning which Hart may be heard under Section 1109 of the
18 Bankruptcy Code, whether formal or informal, whether written or oral, and whether transmitted
19 or conveyed by electronic mail, mail, hand delivery, telephone, telegraph, facsimile, or otherwise.

20 This notice of appearance and request for special notice, as well as any subsequent
21 appearance, pleading, claim or suit, are without prejudice to and do not waive and expressly
22 reserves: (1) Hart’s rights, remedies, claims, actions, defenses, setoffs, or recoupments, in law or
23 in equity, against the above-captioned debtor and any other person either in this case or in any
24 other action; (2) any objection which may be made to the jurisdiction of the Court; (3) Hart’s
25 right to have final orders in non-core matters entered only after de novo review by a district
26 judge; (4) Hart’s right to trial by jury in any proceedings or trial, in any state or federal court, so
27 triable herein or in any case, controversy or proceeding relating hereto; and (5) Hart’s right to
28 have and reference withdrawn in any matter subject to mandatory or discretionary withdrawal.
This notice of appearance and request for special notice, as well as any subsequent appearance,
pleading, claim or suit, are not, shall not be deemed or construed as, a submission of Hart to the
jurisdiction of the Court concerning any claim or the waiver of any rights of Hart to pursue any

NOTICE OF APPEARANCE AND REQUEST FOR SPECIAL NOTICE; Case Nos. 19-30088, 19-30089

1 claims against any person in any other forum, state or federal, including without limitation, the
2 jurisdiction of the Court to adjudicate non-core matters, all of which rights are reserved without
3 prejudice.

4
5 Dated: February 20, 2019

GROSS & KLEIN LLP

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7 By: /s/ Stuart G. Gross
STUART G. GROSS

8 *Attorneys for Laura Hart*
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